

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: GEISINGER SYSTEM  
SERVICES AND EVANGELICAL  
COMMUNITY HOSPITAL  
HEALTHCARE WORKERS  
ANTITRUST LITIGATION

No. 4:21-cv-00196

Chief Judge Matthew W. Brann

**DECLARATION OF ADAM J. ZAPALA**

I, ADAM J. ZAPALA, declare and state as follows:

1. I am an attorney duly licensed to practice law in California and admitted to practice in this Court. I am a partner with Cotchett, Pitre & McCarthy, LLP, and an attorney for Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth in this Declaration, and, if called as a witness, I could and would testify to them. I make this declaration pursuant to 28 U.S.C. § 1746.

2. I submit this Declaration in support of Plaintiffs' Motion for Class Certification and Memorandum in Support thereof and Plaintiffs' Motion to Exclude an Opinion and Related Analyses of Dr. Laurence Baker and Memorandum in support thereof (together, "Motions") concurrently submitted herewith.

3. Since the inception of this litigation in 2021, Nichole Leib and Kevin Brokenshire have responded to 22 document requests, 35 interrogatories, and 10 requests for admission. They assisted counsel in the collection of documents of over 120,000 documents from personal electronic devices, email accounts, and social

media accounts. Each sat for two depositions totaling over 10 hours of testimony on the record for both.

4. Attached hereto are true and correct copies of the following Exhibits:

<b>Exhibit No.</b>	<b>Expert Materials</b>
1	Expert Report of Edward Leamer, Ph.D. (Plaintiffs' Expert) (January 16, 2024)
2	Errata to the Expert Report of Professor Edward Leamer (January 19, 2024)
3	Expert Report of Edward Leamer, Ph.D. (Corrected) (LR1) (January 16, 2024)
4	Expert Report of Professor Alan Manning (Plaintiffs' Expert) (MR1) (January 16, 2024)
5	Expert Report of Laurence Baker, Ph.D. (Defendants' Expert) (March 8, 2024)
6	Errata to Expert Report of Laurence Baker, Ph.D. (March 12, 2024)
7	Expert Report of Laurence Baker, Ph.D. (Corrected) (March 8, 2024)
8	Errata to Expert Report of Laurence Baker, Ph.D. (April 25, 2024)
9	Expert Report of Laurence Baker, Ph.D. (Further Corrected) (BR) (March 8, 2024)
10	Rebuttal Report of Edward Leamer, Ph.D. (LR2) (April 19, 2024)
11	Rebuttal Report of Professor Alan Manning (MR2) (April 19, 2024)
12	Excerpt of Deposition Transcript of Laurence Baker, Ph.D. (May 28, 2024)
	<b>Case Documents and Transcripts</b>
13	GHS-LIT-01035394
14	EVAN0004817
15	GHS-LIT-00253974
16	GHS-LIT-00253952
17	GHS-LIT-00193611
18	GHS-LIT-00193668

19	GHS-LIT-00193741
20	EVAN0002847
21	GHS-LIT-00161134
22	EVAN0130786
23	EVAN0001701
24	EVAN0021411
25	EVAN0004815
26	EVAN0003354
27	EVAN0003356
28	EVAN0128301
29	EVAN0004060
30	EVAN0005276
31	EVAN0129792
32	EVAN0135848
33	EVAN0138306
34	EVAN0021180
35	GHS-LIT-00193615
36	Excerpt of GHS-LIT-01783832
37	GHS-LIT-00193704
38	EVAN0023364
39	GHS-LIT-00193521
40	GHS-LIT-00371270
41	GHS-LIT-00298546
42	EVAN0147787
43	EVAN0193633
44	GHS-LIT-01738214
45	GHS-LIT-00391107
46	EVAN0203845
47	GHS-LIT-01035157
48	GHS-LIT-00473901
49	Excerpt of Deposition Transcript of Angela Hummel (Evangelical) (July 18, 2023)
	<b>Other Documents</b>
50	Complaint, <i>United States v. Geisinger Health and Evangelical Cmty. Hosp.</i> , No. 4:20-cv-01383-MWB (M.D. Pa. Aug. 5, 2020), ECF No. 1

5. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 14th day of June 2024 in Burlingame, California.

/s/ Adam J. Zapala

Adam J. Zapala

### **CERTIFICATE OF SERVICE**

I, Adam J. Zapala, hereby certify that on June 14, 2024, I filed a true and correct copy of the foregoing Declaration of Adam J. Zapala and Exhibits thereto via ECF and mail to the Clerk of Court. I further certify that the same documents were served via email upon all counsel of record in this matter.

/s/ Adam J. Zapala  
Adam J. Zapala